

Message

From: Karlson, Kristine [Karlson.Kristine@epa.gov]
Sent: 11/18/2014 1:05:57 AM
To: Chew, Sandra [Chew.Sandra@epa.gov]
CC: Bromley, Eugene [Bromley.Eugene@epa.gov]
Subject: RE: New DMR Form reporting

Eugene – can you add Sandra to the invite for Wed afternoon?

Sandra – can you and I talk about this tomorrow a little (time allowing)? Let me know if you'll have any gaps in your day for a brief check-in. I only have one meeting scheduled right now, from 9:30 – 9:45 – software installation.

Thanks,
Kristine

Kristine Karlson
(415) 947-4297

From: Chew, Sandra
Sent: Monday, November 17, 2014 2:07 PM
To: Karlson, Kristine
Cc: Bromley, Eugene
Subject: RE: New DMR Form reporting

Hi Kristine,

I've made most of the changes for Freeport-McMoRan. Just a few more details I need to look at more closely. I'm supposed to be in an ICIS training all week, but I've been going in and out to get some work done. I'll try to meet with you and Eugene on Wednesday. Let me know if you have a room reserved.

SANDRA CHEW
U.S. EPA REGION 9
INFORMATION MANAGEMENT SECTION, ENF-4-1
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105
(415) 972-3335

From: Karlson, Kristine
Sent: Monday, November 17, 2014 1:53 PM
To: Chew, Sandra
Cc: Bromley, Eugene
Subject: RE: New DMR Form reporting

Eugene and I had an internal call on Friday, but we both decided we needed more time to go through the list and look at what was being asked before talking it through. We're going to reconvene on Wednesday afternoon at 3 PM. Can you make it? We would like you in on the discussion. No call with Steve is planned, yet – will have to wait until after Wed.

-KK

Kristine Karlson

(415) 947-4297

From: Chew, Sandra
Sent: Monday, November 17, 2014 1:27 PM
To: Karlson, Kristine
Subject: RE: New DMR Form reporting

Kristine,

Did you and Eugene have a conference call with Steve Lawry on Friday? If not, do you plan to have one?

SANDRA CHEW
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From: Karlson, Kristine
Sent: Monday, November 17, 2014 10:37 AM
To: STEVE LAWRY
Cc: Bromley, Eugene; Chew, Sandra
Subject: RE: New DMR Form reporting

Hi, Steve – The table was my attempt to clarify deadlines, given the combination of information request and permit conditions. If it's more helpful to go back to the wording of the information request and permit themselves, you should use those instead. The information request set a deadline of 60 days after receipt to begin using the selected method. You can see the receipt dates in the table, some of which are actually several days after you originally thought them to be. I then added 60 days (or more if there was an extension) to reflect the cutoff date for reporting using the old method – this is reflected in the next column. I then looked at the permit deadlines (all on them on the 28th of the month following the applicable monitoring period) and recorded the first due date that would occur after the 60-day (or extended) cutoff point. I hope this helps.

Thanks,
Kristine

Kristine Karlson
(415) 947-4297

From: STEVE LAWRY [<mailto:lawrylts@sbcglobal.net>]
Sent: Monday, November 17, 2014 9:44 AM
To: Karlson, Kristine
Cc: Bromley, Eugene; Chew, Sandra
Subject: Re: New DMR Form reporting

Hi Kristine, in closer review I wanted to confirm something with the table you sent below. Hondo for example will not be required to start using the new forms in Dec, but instead they will be required to begin using them "after" Dec. 28th as listed in the table. The "After" in the fourth column threw me off..... If what I said is correct, I agree that we will have ample time for Sandra and Industry to get these all ready to go.

Thanks so much Kristine and best regards,

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator
Marine Biologist, LTS Environmental, Inc.
(805) 644-4560

From: "Karlson, Kristine" <Karlson.Kristine@epa.gov>
To: STEVE LAWRY <lawrylts@sbcglobal.net>; "Bromley, Eugene" <Bromley.Eugene@epa.gov>
Cc: "Chew, Sandra" <Chew.Sandra@epa.gov>
Sent: Friday, November 14, 2014 10:06 AM
Subject: RE: New DMR Form reporting

Hi, Steve – Here is the schedule, as I understand it, based on the permit deadlines, juxtaposed against the 308 deadlines:

Operator	Date 308 Rec'd	60-day Reporting Deadline (Extended Deadline, if granted)	Date After Which First DMRs Must Use New Method	Reporting Method Selected
Exxon	10/7/14	12/6/14	Harmony – 1/28/15 Heritage – 2/28/15 Hondo – 12/28/14	Preprints
Pacific Operators	10/10/14	12/9/14 (1/8/15)	3/28/15	Preprints
Venoco	10/3/14	12/2/14 (1/1/15)	Gail – 3/28/15 Grace – 2/28/15	Preprints
BETA Offshore	10/2/14	12/1/14	1/28/15	Preprints
Freeport-McMoRan	9/24/14	11/23/14 (12/23/14)	Harvest – 1/28/15 Hermosa – 2/28/15 Hidalgo – 3/28/15 Irene – 2/28/15	Preprints

I believe this schedule provides ample time to conclude our DMR edits and begin using the new forms. We have no plans to extend any additional DMR reporting deadlines at this time. If you have specific concerns you would like to raise, please let me know. We can schedule a conference call with Sandra to see how they can be addressed.

Thanks,
Kristine

Kristine Karlson
(415) 947-4297

From: STEVE LAWRY [mailto:lawrylts@sbcglobal.net]
Sent: Friday, November 14, 2014 9:53 AM
To: Karlson, Kristine; Bromley, Eugene
Cc: Chew, Sandra
Subject: New DMR Form reporting

Hi Kristine, I left you a message too. The way the permit has the reporting schedule lined out for the various platforms, several of the platforms will not be required to complete the new DMR forms currently being worked on until January. With the 30 day extension you granted everyone, it appears that will expire on Dec. 22 for FM O&G and Dec. 26th for POOI and Venoco. That would put their platforms within the deadline to report on the new forms by the Dec. 28th due date. We haven't even began to make comments on the POOI, Beta or Exxon forms yet so there is still work to be done and with the holidays, it will be a challenge to get all the new forms done in Dec as

we convert over to an entirely new reporting format. Is it possible to have everyone begin reporting on the new forms January 1st 2015? This way everyone would be under the same timeline reporting requirement for the new forms. That would sure help.

Thank you so much Kristine for considering this request and working with us. Please call me if you would like to discuss this in more detail.

Best Regards,

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator
Marine Biologist, LTS Environmental, Inc.
(805) 644-4560